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8 Attorneys for Plaintiff
Solar Sense DCS I, LLC

10 UNITED STATES DISTRICT COURT

11 EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION

13 Solar Sense DCS I, LLC,

14 Plaintiff,

15 vs.

16 Solar Eclipse Investment Fund III, LLC, et al.,

17 Defendants.

Case No. 2:20-cv-02184-JAM-JDP

**STIPULATION FOR EXTENSION OF
TIME TO ANSWER COMPLAINT AND
SUBMIT JOINT STATUS REPORT**

Assigned to Hon. District Judge John A.
Mendez

Trial Date: N/A

19 Plaintiff SolarSense DCS I, LLC (“SolarSense”), and Defendant Solar Eclipse Investment
20 Fund III, LLC (“Fund III”) hereby stipulate and agree to (1) an extension of time for Fund III to
21 answer the Complaint from January 4, 2021 through and including February 1, 2021, and (2) an
22 extension of the deadline for the parties to submit the Joint Status Report and otherwise comply
23 with the requirements of the Court’s October 30, 2020 Order [ECF No. 3] through and including
24 March 3, 2021.

25 This additional time is needed for the parties to resolve a fundamental issue concerning the
26 jurisdiction of this Court. SolarSense and Fund III are in the process of determining the
27 citizenship of the various members/partners of the non-public limited liability companies and
28 limited partnerships that are parties or controlling persons of parties to this case to confirm

1 whether diversity jurisdiction exists. The parties hope to resolve the jurisdictional issue without
2 motion practice.

3 The parties respectfully submit that judicial economy is best served in determining whether
4 this Court has jurisdiction first before requiring Fund III to file an answer or otherwise proceeding
5 with the case. Accordingly, SolarSense and Fund III respectfully submit that good cause exists for
6 this extension of time.

7 DATED: December 21, 2020

SEVERSON & WERSON
A Professional Corporation

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10 By: /s/ Michael J. Steiner
MICHAEL J. STEINER

11 Attorneys for Plaintiff Solar Sense DCS I, LLC

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13 DATED: December 18, 2020

BAKER & HOSTETLER LLP

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15 By: /s/ Kimberly S. Morris (authorized on
December 18, 2020)
KIMBERLY S. MORRIS

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17 Attorneys for Defendant SOLAR ECLIPSE
18 INVESTMENT FUND III, LLC

19 I, Michael J. Steiner, am the ECF user whose identification and password are being used to
20 file this Stipulation. I hereby attest that Kimberly S. Morris has concurred in this filing.

21 By: /s/ Michael J. Steiner

22
23 **ORDER**

24
25 PURSUANT TO STIPULATION, IT SO ORDERED.

26 DATED: December 21, 2020

/s/ John A. Mendez
THE HONORABLE JOHN A. MENDEZ
UNITED STATES DISTRICT COURT JUDGE